

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

ZUNUM AERO, INC.,

Plaintiff

v.

THE BOEING COMPANY; BOEING
HORIZONX VENTURES, LLC,

Defendants.

Case No. 2:21-cv-00896-JLR

**JOINT STIPULATION AND
[PROPOSED] ORDER ON SEALING**

NOTED ON MOTION CALENDAR:
June 7, 2024

Pursuant to this Court’s Minute Entry dated May 15, 2024 (Dkt. 637, the “Minute Entry”), Plaintiff Zunum Aero, Inc. (“Zunum”) and Defendants The Boeing Company and Boeing HorizonX Ventures, LLC (“Boeing”) (collectively, the “Parties”), hereby submit this Joint Stipulation and Proposed Order (“Stipulation”).

WHEREAS, the Parties have conferred regarding their collective sealing requests in Dkts # 611 and 622;

WHEREAS, the Parties have conferred as to whether the following documents should remain under seal, be filed in redacted form, or be unsealed;

WHEREAS, in entering this Stipulation, the Parties do not concede, including as to any post-trial and appellate briefing, that any party’s “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” materials or information do, in fact, contain any confidential

information. The Parties expressly reserve the right to argue that any material or information does not contain confidential information and should not have been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Stipulated Protective Order. Furthermore, the Parties expressly agree that they will not argue that positions taken in this Stipulation have any bearing on whether materials or information, do, in fact, contain any confidential information or trade secrets.

NOW, THEREFORE, the Parties respectfully propose that the following documents should remain under seal, be filed in redacted form, or be unsealed, as specified in the right-hand column below:

Docket 611: Zunum’s Motion to Seal Zunum’s Trial Brief			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 619] Zunum’s Trial Brief	N/A	N/A	N/A
[Dkt. 615] Exhibit 1 to Baigent Declaration	N/A	N/A	N/A
[Dkt. 616] Exhibit 4 to Baigent Declaration	N/A	N/A	N/A
[Dkt. 617] Exhibit 5 to Baigent Declaration	N/A	N/A	N/A
[Dkt. 618] Exhibit 6 to Baigent Declaration	N/A	N/A	N/A

Docket 622: Zunum’s Motion to Seal Two Exhibits Submitted in Connection with Zunum’s Statement Regarding Trade Secret Definitions and Documents			
Document	Zunum Proposal	Boeing Proposal	Zunum’s Proposal
[Dkt. 625] Exhibit 2 to Zunum’s Statement	Seal Entirely	N/A	Seal Entirely

Docket 622: Zunum's Motion to Seal Two Exhibits Submitted in Connection with Zunum's Statement Regarding Trade Secret Definitions and Documents			
Document	Zunum Proposal	Boeing Proposal	Zunum's Proposal
[Dkt. 626] Exhibit 3 to Zunum's Statement	Seal entirely	N/A	Seal Entirely

Dated: June 11, 2024

By: /s/ Scott M. Danner

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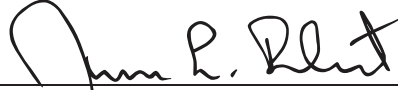
Counsel for Defendants

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED THAT, pursuant to the Stipulation, and for compelling reasons shown: Dkts. 625 and 626 shall remain under seal.

IT IS SO ORDERED.

DATED this 12th day of June, 2024.

A handwritten signature in black ink, appearing to read "James L. Robart", written over a horizontal line.

The Honorable James L. Robart
United States District Judge